Exhibit 'B'

Michael Hassard

From: Brandy Peery

Sent: Brandy Peery

Speery@lawdcm.com>
Thursday, August 3, 2023 4:52 PM

To: Michael Hassard; David Apple; Ricardo Cedillo; Derick Rodgers;

jrios@therioslawfirm.com; lewis.harley@harleylawgroup.com

Cc: Tor Ekeland; Tauseef Ahmed; Ricardo Cedillo Subject: RE: Continuance - Cantu et al v. Guerra et al

Michael-

Although we can sympathize with your scheduling conflicts, the Court, by setting this case for trial in less than 6 weeks on September 11, 2023, has sent a clear message to the parties that there will be no further delays in the final disposition of this lawsuit. The message has been received and Defendants recognize they are not in any position to oppose the will of the Court or its inherent authority to control its docket. Therefore, Defendants and their respective counsel are working diligently to rearrange their schedules and conflicting trial settings to comply with the Court's order. I have conferred with DFC's counsel, David Apple, and, for the foregoing reasons, we cannot agree to Plaintiffs' request for a continuance of this case, let alone a 6-month continuance until February 2024.

Brandy C. Peery Shareholder



Note: New Suite Number

OFFICE: 210-822-6666 FAX: 210-660-3795

EMAIL: <u>bpeery@lawdcm.com</u>

ADDRESS: 755 E. Mulberry Ave., Suite 250

San Antonio, Texas 78212

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From: Michael Hassard < Michael@torekeland.com>

Sent: Thursday, August 3, 2023 11:49 AM

To: David Apple <jdapple@applefinklaw.com>; Ricardo Cedillo <rcedillo@lawdcm.com>; Brandy Peery

lewis.harley@harleylawgroup.com

Cc: Tor Ekeland <tor@torekeland.com>; Tauseef Ahmed <tauseef@torekeland.com>

Subject: [External] Continuance - Cantu et al v. Guerra et al

Counsel,

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The Court has scheduled a pre-trial conference in the above referenced matter for September 7, 2023, and a jury trial for September 11. These dates do not work for us. We have a federal criminal trial in Washington D.C. scheduled to begin on September 14, with a pretrial conference scheduled on September 6. The case is titled *c* Mr. Sterlingov faces a potential life sentence.

Accordingly, we will need to file for a continuance in this case. Would you oppose any continuance filed on these grounds. If not, we'd like to work with you to propose dates that work for both sides. We are available in February and would like to schedule this trial for then. Would February work for you?

Michael Hassard Associate Tor Ekeland Law, PLLC 30 Wall Street, 8th Floor New York, NY 10005 p. 718-737-7264

<u>michael@torekeland.com</u> torekeland.com